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March 20, 2024

**VIA ECF**

Hon. Robert W. Lehrburger  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Request granted. The initial pretrial conference is adjourned sine die. The parties shall file a joint status report by April 20, 2024. SO ORDERED:

3/21/2024

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

Re: *E.E. et al v. New York City Department of Education et al.*  
23-cv-11310

Your Honor:

I am Defendants' counsel in the above-captioned matter. In this action, Plaintiffs seek enforcement of a final administrative order under the IDEA and to prepare an accounting of all pendency services provided to the Student pursuant to 20 U.S.C. § 1415(j) during the period March 1, 2020 through January 8, 2021 and to provide the Student with a bank of compensatory education services equivalent to the number of pendency-mandated hours of instruction and services missed during the period March 1, 2020 through January 8, 2021, and additional compensatory education. As the Court is aware, E.E. is a named Plaintiff in the M.G. class action and, the parties have a track record in settling these types of cases both for named Plaintiffs and putative class members.

The parties request that the Court adjourn the Initial Pretrial Conference scheduled for March 28, 2024, *sine die* (or at least for sixty days), with a status letter due within 30 days, as the parties would like to engage in global settlement discussions, with a priority on first trying to resolve any outstanding pendency and implementation issues. If the parties can reach a settlement in principle on those substantive issues, the parties will then seek to settle attorney's fees, after Plaintiffs provide Defendant with billing records.

Thus, the parties respectfully request that the Court adjourn the Initial Pretrial Conference and propose that the parties submit a joint status letter on or before April 28, 2024, to inform the Court on the status of settlement negotiations.

Thank you in advance for your consideration of this matter.

Respectfully Submitted,

/s/

Bryn M. Ritchie  
Assistant Corporation Counsel